

UNDER

The Resource Management Act
1991

IN THE MATTER OF

Resource consent application by
WINTON STOCK FEED LIMITED
to vary the conditions of Land Use
Consent LUC17/47070 pursuant
to section 127 of the Resource
Management Act 1991.

Council Reference:
LUC17/47070.01

RIGHT OF REPLY FOR THE APPLICANT

WINTON STOCK FEED

9 May 2021

1. REPLY TO ISSUES RAISED AT THE HEARING

Crash Record

- 1.1 Updated Waka Kotahi Crash Data from May 2020 was forwarded to Ms. Julie Straka, NPDC Hearings' Administrator on 28 May 2021. The data showed there had been no new recorded crashes since May 2020.

Normal Operations

- 1.2 No restrictions on normal operations are considered necessary as a result of this variation application. Neither Mr. Steele or Mr. Skerrett as traffic experts raised any concerns in regard to traffic safety and efficiency matters with respect to normal operations.
- 1.3 No conditions on normal operations were imposed under the original consent application other than the substantial accordance requirement under condition 1. Normal operations were described as follows in the original consent application (page 9):

During normal operations the depot will generally operate between 7am-9pm with two to three staff on site. Approximately 770 truck movements are expected per year. One movement being a truck entering and exiting the site. Trucks will typically be truck and trailer units. This equates to 2-3 truck movements per day (at an average of 21 VEM/day). Estimated light vehicle movements for staff (noting there will be no direct public sales from the site) are up to 6 VEM per day.

In combination with the continuation of the existing activities on the site (being the residential dwelling and agricultural contracting yard) up to a maximum of 86 VEM/day are anticipated (based on 3 truck movements and staff movements) with an average of 57 VEM/day over a seven-day period.

Deliveries are anticipated to be throughout the New Plymouth area, with delivery units expected to enter and exit the site in both directions along Manutahi Road as required to meet client orders.

During normal operating conditions it is anticipated that delivery units would enter and exit from both the east and west of Manutahi Road in relatively equal proportions.

Mr. Jamie Stephens, Winton Stock Feed (the Applicant), noted at the hearing that normal operations are typically undertaken by a single staff member with deliveries undertaken as required throughout the week to include weekends. Although typically involving less staff than as consented, normal operations are considered to be undertaken in substantial accordance with the original consent application as granted.

2. RIGHT OF REPLY IN RESPECT OF MATTERS RAISED BY SUBMITTERS

Matthew Hareb

2.1 Mr. Hareb commented that there is no consistency with truck drivers used for bulk import operations. As noted by the Applicant at the hearing, there have been 19 bulk importing events undertaken since operations commenced on the site between June 2018 and April 2021. The Applicant acknowledges that during the first four import events there was variation in the truck operators used. The Applicant has since consistently used the same single contractor to manage truck operations during bulk import events, providing consistency with drivers used.

2.2 Mr. Hareb commented on the potential for vehicle conflict at the right of way entrance due to a lack of marking. The Applicant acknowledges Mr. Hareb's comments and, should the Commissioner consider centreline marking to have merit in the context of addressing traffic safety and efficiency concerns, would be willing to undertake centreline marking at the throat of the right of way.

3. CONCLUDING COMMENTS

3.1 It is submitted that all other issues in the Hearing have been thoroughly canvassed in the application, the Applicant's evidence, Council's evidence and discussions during the course of the hearing.

3.2 An agreed version of consent conditions following joint witness conferencing by the planning experts was submitted to Ms. Straka on 31 May 2021.

Signed on Wednesday 9th June 2021 by:



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Aaron Edwards
Agent acting on behalf of the Applicant.